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2 UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
3 CIVIL ACTION NO.: 2:16-CV-06576

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4 INDUSTRIA DE ALIMENTOS ZENU
5 S.A.S.,

6 Plaintiff,

7 -against-

8 LATINFOOD U.S. CORP. D/b/a
9 ZENU PRODUCTS CO. and WILSON
10 ZULUAGA,

11 Defendant/Counter Plaintiff,

12 -----x

13 LATINFOOD U.S. CORP. d/b/a ZENU
14 PRODUCTS CO.,

15 Defendant/Counter Plaintiff,

16 vs.

17 INDUSTRIA DE ALIMENTOS ZENU
18 S.A.S. and CORDIALSA USA, INC.

19 Counter Defendants.

20 -----x

EXHIBIT G

21 April 12, 2019

22 10:15 a.m.

23 VOLUME II

24 Continued Confidential Deposition of LUIS SALAZAR
25

<p style="text-align: right;">Page 152</p> <p>1 L. SALAZAR</p> <p>2 MR. RAYMOND: Is there a</p> <p>3 question? Can we finish the</p> <p>4 question?</p> <p>5 MR. INGBER: It's not a</p> <p>6 question. I'm making a statement</p> <p>7 first.</p> <p>8 MR. RAYMOND: I object to the</p> <p>9 statement. That's not an</p> <p>10 appropriate thing to do in a</p> <p>11 deposition.</p> <p>12 I'd also point out that a</p> <p>13 30(b)(6) witness who's not a</p> <p>14 lawyer doesn't have to be sent to</p> <p>15 law school to understand the</p> <p>16 intricacies of trademark and</p> <p>17 copyright registrations. He's</p> <p>18 answered any questions you've had</p> <p>19 about the fact that they have</p> <p>20 these registrations. He simply</p> <p>21 testified that he's not the person</p> <p>22 who does the filings or creates</p> <p>23 the documents because the lawyers</p> <p>24 do that.</p> <p>25 MR. INGBER: The witness has</p>	<p style="text-align: right;">Page 154</p> <p>1 L. SALAZAR</p> <p>2 produced so that we can ask</p> <p>3 appropriate questions.</p> <p>4 MR. RAYMOND: Good. I signed</p> <p>5 the copyright registrations, so I</p> <p>6 think you have the right to depose</p> <p>7 me about those. Be my guest. We</p> <p>8 will oppose such a request.</p> <p>9 MR. INGBER: No, we're not</p> <p>10 deposing you.</p> <p>11 MR. RAYMOND: I know.</p> <p>12 MR. INGBER: Again, it's not</p> <p>13 just the actual filings. It's the</p> <p>14 fact that there's a number of</p> <p>15 allegations in the complaint that</p> <p>16 relate to representations about</p> <p>17 subpar, and about defective, and</p> <p>18 about Cordialsa that this witness</p> <p>19 doesn't seem to have any</p> <p>20 information on behalf of the</p> <p>21 company.</p> <p>22 And we'll be sending a</p> <p>23 request that such a different</p> <p>24 witness be produced.</p> <p>25 MR. RAYMOND: I object to</p>
<p style="text-align: right;">Page 153</p> <p>1 L. SALAZAR</p> <p>2 no particular knowledge that any</p> <p>3 of these applications, both</p> <p>4 copyright and trademarks, were</p> <p>5 even filed.</p> <p>6 MR. RAYMOND: Mark, ask your</p> <p>7 questions.</p> <p>8 MR. INGBER: I'm making a</p> <p>9 statement.</p> <p>10 MR. RAYMOND: If you want to</p> <p>11 make motions afterwards, go ahead,</p> <p>12 make whatever motions you want.</p> <p>13 MR. INGBER: I just want to</p> <p>14 put it on the record. I'm</p> <p>15 allowed -- it's my deposition, I'm</p> <p>16 allowed to say what I want here.</p> <p>17 I've also asked questions</p> <p>18 about particular allegations in</p> <p>19 this complaint, including</p> <p>20 Paragraphs 83. And the witness</p> <p>21 has indicated that he has no</p> <p>22 knowledge of this and that -- so</p> <p>23 we're going to put a written</p> <p>24 request in that a witness who's</p> <p>25 knowledgeable about the topics be</p>	<p style="text-align: right;">Page 155</p> <p>1 L. SALAZAR</p> <p>2 your statement. And you can file</p> <p>3 whatever request, motion you feel</p> <p>4 like and we will deal with it as</p> <p>5 appropriate.</p> <p>6 MR. INGBER: Well, I'm not</p> <p>7 going to file any motion at this</p> <p>8 stage right now. I just put it on</p> <p>9 the record and we'll put it in the</p> <p>10 written request that an additional</p> <p>11 witness be produced.</p> <p>12 Q Mr. Salazar, are you a sales</p> <p>13 and marketing person at Industria?</p> <p>14 MR. RAYMOND: Objection to</p> <p>15 form. It's been asked and</p> <p>16 answered. But you can answer</p> <p>17 again.</p> <p>18 A I said it yesterday. I am</p> <p>19 the marketing and sales director, as</p> <p>20 well as research and development.</p> <p>21 Q And I believe you testified</p> <p>22 yesterday, if I'm correct, that</p> <p>23 Industria has no sales or marketing of</p> <p>24 the Zenu-branded products in the U.S.;</p> <p>25 is that right?</p>